

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: : CHAPTER 13  
Robert J. Waldron, Jr. :  
Debtor : BANKRUPTCY NO.: 17-16763-elf

**RESPONSE TO MOTION FOR RELIEF**

Debtor, by his attorney, Brandon J. Perloff, Esq. by way of Response to Movant's Motion, respectfully represents the following:

1. Denied. Movant's averment contains factual allegations contained in documents filed with the Court and on record. The Debtor does not attest to the veracity of said documents and said documents speak for themselves. Movant's allegation is therefore denied.
2. Admitted.
3. Denied. Movant's averment contains factual allegations contained in documents filed with the Court and on record. The Debtor does not attest to the veracity of said documents and said documents speak for themselves. Movant's allegation is therefore denied.
4. It is admitted that the Notice of Mortgage Payment Change indicates a current monthly payment of \$1,581.32.
5. Denied. The Debtor has cured any delinquency on the mortgage and is current.
6. Denied. The Debtor has cured any delinquency on the mortgage and is current.
7. Denied. The Debtor has cured any delinquency on the mortgage and is current.
8. Denied. The Debtor does not have the requisite knowledge to attest to the veracity of Movant's averment.
9. Denied. Movant's averment is a conclusion of law, no response is required.

10. Movant's averment does not call for a response.

WHEREFORE, Debtor pray that the Movant's request for relief be denied.

Date: March 9, 2021

/s/ Brandon J. Perloff  
Brandon J. Perloff Esquire.